	Case 3:16-cv-00501-RCJ-CSD Document 95 Filed 04/09/24 Page 1 of 3		
1 2 3 4 5 6 7 8	ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 ROGER P. CROTEAU & ASSOCIATES, LTD. 2810 W. Charleston Blvd., #67 Las Vegas, Nevada 89102 (702) 254-7775 (702) 228-7719 (facsimile) croteaulaw@croteaulaw.com Attorney for Defendant THUNDER PROPERTIES, INC.		
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10 11	UNITED STATES DISTRICT COURT		
12	DISTRICT OF NEVADA		
13 14 15 16	US BANK NATIONAL ASSOCIATION, AS) TRUSTEE FOR THE SPECIALTY) UNDERWRITING AND RESIDENTIAL) FINANCE TRUST AND MORTGAGE LOAN) Case No. 3:16-cv-00501-RCJ-CSD ASSET-BACKED CERTIFICATES SERIES) 2006-BC4,)		
17	Plaintiff,)		
18	vs.		
19 20 21	WOODLAND VILLAGE; WESTLAND REAL) ESTATE DEVELOPMENT AND) INVESTMENTS; THUNDER PROPERTIES,) INC.; AND PHIL FRINK & ASSOCIATES,) INC.,)		
22	Defendants.)		
23	ORDER TO EXTEND TIME		
24 25	TO RESPOND TO MOTION FOR SUMMARY JUDGMENT AND MOTION TO STAY DISCOVERY (First Request)		
26	COMES NOW, Defendant, THUNDER PROPERTIES, INC., and Plaintiff, US BANK		
27	NATIONAL ASSOCIATION, AS TRUSTEE FOR THE SPECIALTY UNDERWRITING AND		
28			
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RESIDENTIAL FINANCE TRUST AND MORTGAGE LOAN ASSET-BACKED CERTIFICATES SERIES 2006-BC4, by and through their undersigned counsel, and hereby stipulate and agree as follows:

- On March 26, 2024, Plaintiff caused a Motion for Summary Judgment and Motion for Protective Order or Motion to Stay Discovery to be filed herein. [ECF #91, 92, 93]. Responses to said Motions are presently due on or about April 9, 2024 and April 16, 2024.
- 2. Defendant's counsel is unable to prepare and file responses by the current deadlines due to various other personal and professional obligations, including the preparation and filing of a Motion to Compel Discovery which is associated with this dispute. Moreover, it will be more efficient and economical to prepare and file all of the required pleadings together.

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1	3. Defendant has requested	d and shall be granted an extension of time to respond to
2	Plaintiff's Motion for Summary Judgment and Motion for Protective Order or	
3	Motion to Stay Discove	ery until April 30, 2024.
4	4. This Stipulation is made	e in good faith and not for purpose of delay.
5	Dated this8 th day of April, 2024.	
6	ROGER P. CROTEAU &	
7	ASSOCIATES, LTD.	AKERMAN, LLP
8	/s/ Timothy E. Rhoda	/s/ Scott R. Lachman
9	TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878	SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016
10	2810 W. Charleston Blvd., #67 Las Vegas, Nevada 89102	DONNA M. WITTIG, ESQ. Nevada Bar No. 11015
11	(702) 254-7775 croteaulaw@croteaulaw.com	1635 Village Center Circle, Suite 200 Las Vegas, NV 89134
12	Attorney for Defendant	(702) 634-5000
13	Thunder Properties, Inc.	scott.lachman@akerman.com donna.wittig@akerman.com
14		Attorney for Plaintiff U.S. Bank National Association
15		
16		IT IS SO ORDERED.
17		By: Janes
18		Judge, U.S. Pistrict Court
19		Dated: April 9, 2024
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